WRITTEN TESTIMONY ON NONTRADITIONAL STUDENTS
SUBMITTED FOR SEPTEMBER 30, 2011 ACSFA HEARING

Below is a list of submissions to the Advisory Committee in response to a call for written testimony on nontraditional students for the September 30, 2011, hearing. The ACSFA press release calling for written testimony is also included.

SUBMISSIONS

Center for Law and Social Policy
Vickie Choitz and Julie Strawn

Excelsior College
John Ebersole

Kaplan Higher Education
Tom Flint

The Ohio State University
Natala Hart

MDRC
Reshma Patel and Lashawn Richburg-Hayes

Education Commission of the States
Matthew Smith and Bruce Vandal

National Association of Independent Colleges and Universities
David Warren

ADVISORY COMMITTEE ON STUDENT FINANCIAL ASSISTANCE

CALL FOR WRITTEN TESTIMONY ON NONTRADITIONAL STUDENTS

The Advisory Committee on Student Financial Assistance is holding a public hearing in Washington DC on Friday, September 30, 2011. The afternoon session will be devoted to strategies, policies, and practices that improve college degree and certificate completion among nontraditional students. Three questions will drive the discussion:

- What are the primary barriers to access and persistence for nontraditional students?
- What are the most promising state and institutional strategies and policies for overcoming those barriers?
- What role should the federal government play in encouraging states and institutions to implement best practices?

To supplement hearing proceedings, we are soliciting written testimony addressing these questions. A report will be delivered to Congress and the Secretary of Education this fall.

Please submit written testimony as a Word or PDF attachment to:

ACSFA@ed.gov

To be considered, testimony must be delivered by Monday, October 3, 2011.

All interested members of the public are invited to attend the hearing.
For more information, including registration details,
see our website: www2.ed.gov/acsfa

Please direct any questions to:
Janet.Chen@ed.gov

80 F Street NW, Suite 413, Washington DC 20202-7582
Tel: 202/219-2099 • Fax: 202/219-3032

An independent committee created by Congress to advise on higher education and student aid policy

CLASP
policy solutions that work for low-income people

Vickie Choitz and Julie Strawn
Center for Law and Social Policy

Testimony for the Record

October 3, 2011

Hearing on Nontraditional Students

Advisory Committee on Student Financial Assistance

CLASP, the Center for Law and Social Policy, is a nonprofit organization that seeks to improve the lives of low-income people by developing and advocating for federal, state and local policies to strengthen families and create pathways to education and work. Within CLASP, the Center for Postsecondary and Economic Success (C-PES) focuses on postsecondary education, workforce, and adult education. The C-PES mission is better policies, more investment, and political will to increase the number of low-income adults and disadvantaged youth who earn postsecondary credentials that are essential to opening doors to good jobs, career advancement, and economic mobility.

CLASP respectfully submits this written testimony on nontraditional students to the Advisory Committee on Student Financial Assistance. Each of the Advisory Committee's published questions is addressed as is a fourth question focused on the role of the federal government in directly assisting nontraditional students. The questions are:

- What are the primary barriers to access and persistence for nontraditional students?
- What are the most promising state and institutional strategies and policies for overcoming those barriers?
- What role should the federal government play in encouraging states and institutions to implement best practices?
- What role can the federal government play directly to help nontraditional students access and persist in postsecondary education?

CLASP appreciates the opportunity to submit written testimony and the Advisory Committee's focus on non-traditional students. These students will continue to be essential to the nation's economic competitiveness, thus assisting them with higher education access, persistence, and completion is increasingly important.

QUESTION 1: What are the primary barriers to access and persistence for nontraditional students?

Nontraditional students face three main barriers to accessing and persisting in postsecondary education:

- **High and persistently increasing net cost of college**, which is driven by increasing tuition, fees, and other direct and indirect costs and by decreasing student financial aid resources.
- **Being academically underprepared** for college-level study.
- **The complexity of navigating traditional college systems**, from enrolling in classes to understanding student aid to successfully managing school, work, and life.

High and persistently increasing net cost of college

Increasing college costs have been well-documented as has reductions in many states' need-based student aid programs. The federal Pell Grant covers a shrinking percentage of college tuition and fees (about one-third today compared to three-quarters when the program began four decades ago). Nontraditional students are especially affected by these growing net college costs because they are more than twice as likely to be low-income than their traditional peers (42 percent versus 18 percent in 2007-2008).[1]

Despite their clear need, many nontraditional students do not apply for student financial aid.[2] Even when nontraditional students apply for and receive aid, a greater number of them have unmet need, and the amount of unmet need for students has increased. For example, the percentage of *undergraduates at two-year institutions* - where many nontraditional students are enrolled - with unmet need after student aid increased from 37 percent in 1995-96 to 50 percent in 2007-08. Their average amount of unmet need increased from $3,000 in 1995-96 to $4,500 in 2007-08. The percentage of *part-time undergraduates* (attending all year) with unmet need increased from 46 percent to 55 percent over this time, and their average unmet need increased from $4,100 to $5,600. The percentage of *independent undergraduates* with unmet need increased from 44 percent to 60 percent, and their average unmet need increased from $4,000 to $6,700. In comparison, overall percentages for *all students* with unmet need increased less dramatically from 46 percent in 1995-96 to 50 percent in 2007-08; however, the amount of unmet need increased just as significantly from $4,100 to $6,800.[3]

Being academically underprepared

Many nontraditional students and are not ready for college-level work. A significant percent of them attend community colleges, where 60 percent of students need remediation. However, few complete developmental education courses they need, and even fewer enroll in and pass their first college-level course. Just three or four out of every 10 referred to developmental education complete all of the courses they need – and the more courses they need to get their skill levels up, the less likely they are to complete all of them.[4]

The complexity of navigating traditional college systems

Nontraditional students face this barrier from two angles. First, institutions of higher education are designed for *traditional* students. Classes are offered during daytime hours Monday through Friday, and administrative offices are usually open only during these times as well. Courses are generally designed for students who are attending full-time, are fresh out of high school, and have few obligations outside of work. Finally, student aid programs tend to favor full-time status and few avenues to receive guidance, advice or supportive services exist because traditional students typically receive these supports from other sources including family and social networks familiar with college.

In comparison, nontraditional students have not been fully prepped for a traditional college experience and their lives do not lend themselves to this design. In 2008, 47 percent of all undergraduates were independent students,[5] meaning that they did not rely on their parents for financial support and, in many cases, also may not have access to valuable career and educational guidance. Also 36 percent of all undergraduates are adults age 25 or over, 46 percent attend part-time, and 32 percent work full-time. These students must balance work, school and family, which make traditional higher education scheduling nearly impossible to accommodate. They rarely find the help they need in choosing programs that best fit their interests and experiences, in enrolling in the right courses, and in accessing enough financial resources to cover the direct and indirect college costs. These students need something different from what traditional colleges offer. While many innovative institutions are moving in the direction to better serve nontraditional students, much more needs to be done.

QUESTION 2: What are the most promising state and institutional strategies and policies for overcoming those barriers?

The barriers that low-income, nontraditional students face to postsecondary success are not fundamentally different from those confronting many other low-income students: the ever increasing cost of college; academic under preparation (coupled with ineffective approaches to remediation); and the daunting complexity of navigating through college, whether applying for financial aid or choosing the right courses. For low-income nontraditional students, these common barriers are compounded by their particular circumstances, which may include having been out of school for years, having families to support, and having child care needs.

Fortunately, many postsecondary institutions and states have been experimenting over the last decade with solutions aimed at addressing these barriers. These solutions include such elements as:

- **Supplementing existing financial aid** with additional aid tailored to the needs of nontraditional students and also helping these students access other available public benefits such as child care, housing and food aid.
- **Creating clearer, simpler paths** into and through college that reflect the diverse goals of nontraditional students, which includes shorter-term occupational certificates as well as longer diploma and degree programs.
- **Adopting new approaches to remediation** that help more students master math, reading, writing, and English skills needed to succeed in their programs of study and that help them earn college credentials faster.
- **Enhancing student services** to give nontraditional students extra help in navigating complex college systems and gaining access to academic and other supports.
- **Linking college more closely to work** through internships and work-study jobs; partnerships between colleges, employers and local workforce boards; and better mapping of college courses and credentials to local employer workforce needs. These steps are especially important for nontraditional students since many of them enter college with the goal of getting a job or moving up to a better one.

CLASP has identified several examples of state and institutional best practices that can help nontraditional students access, persist in, and complete college. Below are longer-running examples with outcomes data demonstrating success. The table provides a quick reference to the programs types of solutions. It is important to note that many programs combine solutions, making for a more well-rounded educational experience and set of supports for the students. Exploring lessons from these state and local initiatives could help inform federal efforts to address barriers to nontraditional student success.

State or local example	Supplemental financial aid	Clearer college and career paths	New approaches to remediation	Enhanced student services	Linking college and work
Opportunity Grants (WA)	•			•	•
Ready to Work (KY)	•			•	•
Career Pathways (OR)		•	• (Portland CC)	•	•
Career Pathway Bridges (WA)		•	•	•	•
CNM Connect (NM)	•			•	

Supplemental Financial Aid and Enhanced Support Services

Two state examples provide instructive examples for how other states might supplement federal student aid to help nontraditional students meet unmet financial need and access and persist in postsecondary education: Washington and Kentucky.

Washington State's Opportunity Grants
Begun in 2006 as a pilot, the program has steadily expanded and, in the 2010-2011 school year, served more than 5,400 students with a state investment of $11.5 million. Opportunity Grants are targeted to low-income students enrolled in occupational programs in high-wage, high-demand career pathways and are designed to supplement other state and federal student aid to address unmet financial need. The immediate goal of this additional aid is to help low-income adults complete one year of college credits and earn an occupational credential. Eligible students enrolled in approved training programs may receive funds to cover tuition and mandatory fees for up to 45 credits and up to $1,000 per academic year for books and supplies. An important part of the program is additional state funds to community and technical colleges for enhanced support services to Opportunity Grant recipients; these may include personalized counseling, one-on-one tutoring, career advising, college success classes, emergency child care, and emergency transportation.

A January 2011 study of Opportunity Grants found that recipients who left college in 2008-09 were 11 percent more likely to complete and 4 percent more likely to finish a year's worth of college credits than similar students. The program had an even bigger impact for the two-thirds of Opportunity Grant students who also received Pell Grants: completion rates were 18 percent higher and the number earning a year of college credits was 11 percent higher compared to other Pell students enrolled in the same programs. This suggests that the effectiveness of federal financial aid can be boosted by a modest investment in additional aid and enhanced student services. The study also examined labor market outcomes and found that, among all Opportunity Grant recipients, post-college employment and earnings were substantially higher for those who completed a credential and for those who earned at least a year's worth of college credits.[6]

Kentucky's Ready-to-Work Program
Similar to Opportunity Grants, this program, started in 1999, pairs increased student aid for nontraditional students—in the form of work-study jobs—with enhanced student services. Ready-to-Work helps low-income parents receiving welfare (Temporary Assistance for Needy Families or TANF) pursue postsecondary certificates and degrees at Kentucky community and technical colleges. In Fiscal Year 2010, Ready-to-Work served approximately 2,000 students with funding of $10.8 million. Students in Ready-to-Work can earn up to $2,500 in TANF-funded work-study opportunities and receive enhanced student services through campus-based Ready-to-Work coordinators and tutors. Work-study jobs are used to build meaningful work experience that can open doors to permanent employment, with some placements off-campus with private employers. They also help students meet their TANF work requirements. TANF funds are crucial to expanding work-study opportunities since federal work-study funds are scarce at community colleges and often insufficient to meet the financial needs of nontraditional students.

The 20 Ready-to-Work coordinators at the state's 16 colleges serve as on-campus case managers, recruiting participants, helping students set education and career goals and access financial aid. They also work with TANF staff and other agencies to arrange support services such as transportation and child care, and they ensure students continue to receive cash assistance. Finally, Ready-to-Work coordinators provide counseling to students at risk of dropping out of college and connect students to educational and employment support, including advising, tutoring, career counseling, job placement, and post-graduation follow-up.[7]

The most recent retention data shows that Ready-to-Work students persist in college at a significantly higher rate than other students (53 percent v. 44 percent). In addition, the program's students earn grade point averages that are as high as or higher than other community and technical college students in the state. For example, in the spring of 2010, 44 percent of Ready-to-Work students had higher GPAs than the college average. One measure of the success of Ready-to-Work is that Kentucky's TANF population now attends college at more than twice the rate of other adults in the state (8.7 percent vs. 3.6 percent).[8] No recent labor market outcome data is available; a 2004 longitudinal study by the legislature found that TANF participants in ―job skills education," who are primarily Ready-to-Work students, had the highest entering employment rate, highest fourth-quarter job retention rate, and highest average annual wage (by over $3,500) of any participants in TANF work activities.[9]

Clearer College and Career Paths – Career Pathway Initiatives

Another way in which states and communities are seeking to improve nontraditional student success is through career pathways initiatives. Career pathways are a way to map education and job opportunities in an industry or occupational cluster and to offer a series of connected education and training programs and support services that enable individuals to get jobs in specific industries, and to advance over time to higher levels of education and work in that industry.[10] At each step in a career pathway, education credentials are connected to specific jobs in the local labor market, with each of these credentials embedded within a for-credit degree program or in an apprenticeship pathway. Career pathways not only offer students clearer paths to credentials with value in the labor market, but also make it easier for working adults to complete programs by breaking longer diploma and degree programs into smaller ―chunks" so that students can earn marketable occupational certificates as they build credits over time toward a degree. Partnerships with employers are critical to successful career pathways to ensure that credentials are aligned with in-demand jobs and to create paid or unpaid internship opportunities for students in their fields of study.

Oregon's Career Pathways

This initiative began in 2004 as an effort to scale up pathways efforts begun by three local colleges. State support included seed money for expanding pathways, support for creating pathways roadmaps, and a streamlined state approval process for new Career Pathways certificates, with a turnaround time of two months or less (an unusually rapid response for state system offices). To submit a new Career Pathway certificate for approval, a college submits a Career Pathway Roadmap with elements including: occupation, competencies, courses, labor market occupational data (including wages and job progression), articulation with four-year programs; industry credentials; and the employers involved in developing the certificate. Oregon also has facilitated a discussion among college financial aid officers to reach a common understanding of how career pathway certificates should be treated for purposes of federal student aid eligibility. Oregon's community colleges now offer more than 180 career pathways certificates across 17 colleges, and the number completing the program has grown from 500 in 2008-09 to 1,200 in 2009-10. The state's two-year goal is 2,345 completions in Fiscal Year 2011. Portland Community College has an especially impressive pathway effort, with contextualized English as a Second Language (ESL) pathway options and student internships as a standard part of every pathway.

New Approaches to Remediation - Career Pathway Bridges

Career pathway bridges are a newer innovation to increase nontraditional student success. Many low-income, nontraditional students lack the basic academic or English language skills needed to succeed in college programs. Career pathway bridges are simply an extension of the career pathways concept to meet

the needs of lower-skilled adults and youth. These bridges provide targeted basic skills and English language education to help lower-skilled students enter and succeed in specific occupational programs and career pathways. While many variations of career pathways bridge models exist, they share some common elements. Career pathway bridges typically:

- **Combine basic skills and career-technical content,** including general workforce readiness skills, pre-college academic and English language skills, and specific occupational knowledge and skills, supported by comprehensive student services.
- **Contextualize basic skills** and English language content to the knowledge and skills needed in a specific occupation or groups of occupations.
- **Use new or modified curricula** with identified learning targets for both the academic and occupational content, articulated to the next level in the college and career pathway.
- **Change how classes are delivered** using such strategies as dual enrollment in linked basic skills and occupational courses; integrated, team-taught basic skills and occupational courses; and, enrolling students in cohorts (also known as learning communities or managed enrollment).
- **Support student success** through comprehensive student services, often including a single point of contact who helps students navigate through college advising and financial aid services, connects students to other public benefits, and works with students to problem-solve as challenges arise that could derail progress.
- **Connect to local employer and community needs** by engaging key partners in design and implementation of bridges, such as employers, unions, workforce development boards, community-based organizations and foundations.

Career pathway bridges are a relatively new approach to basic skills and career-technical education. Consequently, little independent research has been conducted yet on their effectiveness, though local programs report promising early results.

Washington State's I-BEST Program

Washington State's Integrated Basic Education and Skills Training (I-BEST) program pairs basic skills and career-technical instructors in the same classroom simultaneously to teach integrated occupational certificate and basic skills content. The most rigorous study of this program's effectiveness to date was conducted by Columbia University's Community College Research Center (CCRC) in 2010. The study found that I-BEST students are 56 percent more likely than regular adult basic education and ESL students to earn college credit, 26 percent more likely to earn a certificate or degree, and 19 percent more likely to achieve learning gains on basic skills tests—or more simply, as Washington puts it, I-BEST moves students "farther and faster."[11]

In addition to the CCRC study of I-BEST, considerable research exists on individual elements of bridge programs, such as dual enrollment, contextualization, enhanced student services, and learning communities.[12] This research suggests that these can be effective strategies for improving student completion of basic skills coursework and for increasing enrollment in and completion of college-level courses. While the impact of any one of these strategies alone is often modest, the I-BEST experience lends weight to the idea that such strategies may have more impact when combined, as they are in career pathway bridges.

Enhancing Student Services

Initiatives to increase student access to public benefits represent another promising strategy to help nontraditional students complete college. Public benefits and refundable tax credits can help students to begin to fill the gap between financial aid and the actual cost of attending college. This gap can be

especially large for nontraditional students. For example, federal data show that students who are single parents have the largest unmet financial need of any group.[13] Fortunately these student parents may be eligible for cash and nutritional assistance, child care subsidies, public health insurance, and tax credits. And while low-income students who are not parents are generally eligible for fewer benefits, they may still be able to receive support from the Supplemental Nutritional Assistance Program (SNAP, or food stamps) and the refundable portion of the American Opportunity Tax Credit.[14] Many students are unaware of these public benefits, however, and so colleges and universities have begun to create efforts to help them gain access to them as part of the college completion agenda.

CNM Connect at Central New Mexico Community College

This is one of the longest-running benefits access initiatives in the country. Through CNM Connect, Achievement Coaches work with students to help them develop a plan for overcoming financial and logistical obstacles to completing college. For example, coaches help students connect to public benefits, using such online tools as www.newmexicoresources.org and Single Stop USA's online screening tool for benefit eligibility. Students also participate in financial literacy classes, get help with tax preparation, and are connected to opportunities for matched education savings accounts. The Achievement Coaches provide a variety of other one-on-one supports to students, including help with time management, stress reduction, creation of personal budgets, addressing test anxiety, and referrals to other resources available on campus. CNM Connect is a version of the Casey Foundation's Center for Working Families model, which is being implemented at a number of colleges as well as other sites.

QUESTION 3: What role should the federal government play in encouraging states and institutions to implement best practices?

The federal government can take several steps to encourage states and institutions to implement best practices that help nontraditional students access, persist, and complete postsecondary education. CLASP outlines several options below, including several low-cost actions. Whether addressing barriers pertaining to cost, academic under preparation, or college complexity, the federal government should revisit existing funding programs and waiver authority and better use them to support the most promising practices supported by research (see examples in Question #2). For instance, grants to institutions under the Higher Education Act Title III (e.g., Strengthening Institutions Program and Historically Black Colleges and Universities), Title V (e.g., Hispanic Serving Institutions), and Title VII (e.g., Fund for the Improvement of Postsecondary Institutions) could be more sharply focused on research-supported strategies rather than the open range of possibilities currently allowable.

Also, the federal government should consider using the Department of Education's Experimental Sites Initiative to test innovative models, including those described in the recommendations below, which specifically help nontraditional students access, persist in, and complete postsecondary education. Finally, the federal government should continue and deepen partnerships with the private sector, including philanthropy and employers, to leverage additional funds. The partnership the Departments of Labor and Education has with the Aspen Prize for Community College Excellence is a good example focused on community college completion rates. Perhaps a similar effort focused specifically on nontraditional student success could be considered.

Specific recommendations for the federal government's role in encouraging institutions are provided immediately below. Recommendations for what the federal government can do directly to support nontraditional students are provided in the next question.

Cost of Attending College

- Explore Ways to Encourage Institutions to Dedicate Institutional Aid to Assist Nontraditional Students (low cost)

Lack of affordability and growing unmet need are significant barriers for most nontraditional students and insurmountable barriers for some. Yet, increasing reports reveal that higher education institutions are dedicating their fairly significant institutional resources to students who have the ability to pay for much of their education and can bring revenues to the college.[15] While this may be good for the institution's bottom line because the revenues exceed the aid expended, it does nothing to help nontraditional students access and persist in postsecondary education. The federal government should encourage postsecondary institutions to dedicate institutional aid to assist nontraditional students. Options could include providing incentive funding or matching dollars to institutions that provide institutional aid to low-income nontraditional students. Also, the federal government could consider giving these institutions preference for federal funding awards.

Academic Underpreparation

- Pilot New Developmental Education Models That Contextualize Remediation to Occupational Certificate and Degree Programs (low cost)

More than 60 percent of community college students need to improve reading, writing, or math skills before they can do college-level work.[16] Yet, far too few complete these remedial or developmental

courses. The federal government should provide technical assistance and grants to colleges to try new developmental education models that ―bridge” directly to specific occupational certificate and degree programs through contextualized curriculum and intensive counseling and advising for students.

For example, a pilot program called ―Bridges from Jobs to Careers” was authorized by the Higher Education Opportunity Act in 2008, but never funded. The Department of Education could implement these pilots, which could be funded with new funds or by repurposing existing funding sources, and share lessons and promising practices nationally.

- Support Developmental Education Reform with Current Leadership and Regulatory Resources (low cost)

There are several low-cost ways that the Office of Postsecondary Education (OPE) and Student Financial Aid (SFA) – both in the Office of the Under Secretary – can support developmental education reform. They could issue guidance that clearly outlines how student financial aid can be used appropriately to support innovative developmental education reforms including career pathway bridges described in the previous section. OPE and SFA also could issue materials and information to help colleges understand more effective developmental education models and how to design and implement them. Finally, these offices could include innovative models such as career pathway bridges in Experimental Sites demonstrations to explore how these approaches can benefit nontraditional students, in particular.

Complexity of Navigating College and Careers

- Pilot Business Workforce Partnerships (low cost)

Colleges often lack the ―venture capital” to start up new, credit-bearing programs that can respond to business workforce needs because state funding and federal financial aid typically flow only after students are enrolled in programs. Even during this economic slump, many businesses report that they cannot find enough skilled workers to fill their open positions. Nontraditional students are left on the sidelines. Those who are working often cannot make their work and family schedules match educational program schedules. If they are unemployed, they do not have funds to afford the program.

The federal government could help colleges address these workforce needs while at the same time helping nontraditional students by funding pilot programs that fund partnerships of colleges, employers, and, where applicable, labor representatives, to expand or create credit-bearing college programs responsive to business workforce needs; to adapt college offerings to workers' schedules; to expand worksite learning opportunities; and to purchase equipment related to such academic or job training programs. The grants should be targeted specifically to nontraditional students both to assist this struggling student population and to serve a segment of the labor force most in need.

Congress already has authorized a pilot program to create Business Workforce Partnerships in its 2008 amendments to the Higher Education Act. These pilots should be funded and revised if necessary based on current economic needs and what we have learned about such partnerships to date. These pilots could be funded with new funds or with repurposed existing funds.

- Support Career Pathways (low cost).

Career pathway initiatives – as described in Question #2 – show much promise and are beginning to provide evidence of success. The Department of Labor Employment and Training Administration (ETA), Department of Education's Office of Vocational and Adult Education (OVAE), and Department of Health

and Human Services Administration for Children and Families (ACF) have provided leadership and resources to support career pathways. However, the higher education and student financial aid divisions within the Department of Education have been relatively silent, even though many polices and regulations within these divisions can significantly promote or deter this approach to better serving nontraditional students. Also, most career pathway programs are connected to institutions of higher education.

There are several low-cost ways that the Office of Postsecondary Education (OPE) and Student Financial Aid (SFA) can support career pathway initiatives. They could issue guidance clearly outlining how student financial aid can be used appropriately to support career pathways, i.e., similar to OVAE's guidance on Integrated Education and Training released last year. They could partner with ETA, OVAE, and ACF to sponsor institutes or other training on career pathways, e.g., similar to the Career Pathways Technical Assistance Institute jointly run by these offices in 2010-11. OPE and SFA also could issue materials and information to help colleges understand career pathways and how to design and implement them. Finally, they could include career pathways in Experimental Sites demonstrations to explore how the career pathways approach can benefit nontraditional students, especially, and how it can be integrated into the traditional postsecondary education context.

especially large for nontraditional students. For example, federal data show that students who are single parents have the largest unmet financial need of any group.[13] Fortunately these student parents may be eligible for cash and nutritional assistance, child care subsidies, public health insurance, and tax credits. And while low-income students who are not parents are generally eligible for fewer benefits, they may still be able to receive support from the Supplemental Nutritional Assistance Program (SNAP, or food stamps) and the refundable portion of the American Opportunity Tax Credit.[14] Many students are unaware of these public benefits, however, and so colleges and universities have begun to create efforts to help them gain access to them as part of the college completion agenda.

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Specific recommendations for the federal government's role in encouraging institutions are provided immediately below. Recommendations for what the federal government can do directly to support nontraditional students are provided in the next question.

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Lack of affordability and growing unmet need are significant barriers for most nontraditional students and insurmountable barriers for some. Yet, increasing reports reveal that higher education institutions are dedicating their fairly significant institutional resources to students who have the ability to pay for much of their education and can bring revenues to the college.[15] While this may be good for the institution's bottom line because the revenues exceed the aid expended, it does nothing to help nontraditional students access and persist in postsecondary education. The federal government should encourage postsecondary institutions to dedicate institutional aid to assist nontraditional students. Options could include providing incentive funding or matching dollars to institutions that provide institutional aid to low-income nontraditional students. Also, the federal government could consider giving these institutions preference for federal funding awards.

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courses. The federal government should provide technical assistance and grants to colleges to try new developmental education models that ―bridge” directly to specific occupational certificate and degree programs through contextualized curriculum and intensive counseling and advising for students.

For example, a pilot program called ―Bridges from Jobs to Careers” was authorized by the Higher Education Opportunity Act in 2008, but never funded. The Department of Education could implement these pilots, which could be funded with new funds or by repurposing existing funding sources, and share lessons and promising practices nationally.

- Support Developmental Education Reform with Current Leadership and Regulatory Resources (low cost)

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Complexity of Navigating College and Careers

- Pilot Business Workforce Partnerships (low cost)

Colleges often lack the ―venture capital” to start up new, credit-bearing programs that can respond to business workforce needs because state funding and federal financial aid typically flow only after students are enrolled in programs. Even during this economic slump, many businesses report that they cannot find enough skilled workers to fill their open positions. Nontraditional students are left on the sidelines. Those who are working often cannot make their work and family schedules match educational program schedules. If they are unemployed, they do not have funds to afford the program.

The federal government could help colleges address these workforce needs while at the same time helping nontraditional students by funding pilot programs that fund partnerships of colleges, employers, and, where applicable, labor representatives, to expand or create credit-bearing college programs responsive to business workforce needs; to adapt college offerings to workers’ schedules; to expand worksite learning opportunities; and to purchase equipment related to such academic or job training programs. The grants should be targeted specifically to nontraditional students both to assist this struggling student population and to serve a segment of the labor force most in need.

Congress already has authorized a pilot program to create Business Workforce Partnerships in its 2008 amendments to the Higher Education Act. These pilots should be funded and revised if necessary based on current economic needs and what we have learned about such partnerships to date. These pilots could be funded with new funds or with repurposed existing funds.

- Support Career Pathways (low cost).

Career pathway initiatives – as described in Question #2 – show much promise and are beginning to provide evidence of success. The Department of Labor Employment and Training Administration (ETA), Department of Education’s Office of Vocational and Adult Education (OVAE), and Department of Health

and Human Services Administration for Children and Families (ACF) have provided leadership and resources to support career pathways. However, the higher education and student financial aid divisions within the Department of Education have been relatively silent, even though many polices and regulations within these divisions can significantly promote or deter this approach to better serving nontraditional students. Also, most career pathway programs are connected to institutions of higher education.

There are several low-cost ways that the Office of Postsecondary Education (OPE) and Student Financial Aid (SFA) can support career pathway initiatives. They could issue guidance clearly outlining how student financial aid can be used appropriately to support career pathways, i.e., similar to OVAE's guidance on Integrated Education and Training released last year. They could partner with ETA, OVAE, and ACF to sponsor institutes or other training on career pathways, e.g., similar to the Career Pathways Technical Assistance Institute jointly run by these offices in 2010-11. OPE and SFA also could issue materials and information to help colleges understand career pathways and how to design and implement them. Finally, they could include career pathways in Experimental Sites demonstrations to explore how the career pathways approach can benefit nontraditional students, especially, and how it can be integrated into the traditional postsecondary education context.

QUESTION 4: What role can the federal government play directly to help nontraditional students access and persist in postsecondary education?

The most significant role the federal government can play to assist nontraditional students directly is by helping with the high and growing costs of college. Most of the recommendations in this section focus on this role. However, the federal government also can play a role in helping nontraditional students navigate the complexity of college and careers.

Cost of Attending College

- Preserve the Current Maximum Pell Grant and Maintain Commitment to Nontraditional Students' Eligibility

Recently, policy makers and outside experts have floated numerous proposals to reduce Pell Grant expenditures in light of the significant growth in the program over the last three years. All of the proposals would disproportionately harm nontraditional students, including those who work, attend part-time, and have incomes low enough to be eligible for public benefits. Some of the most prominent proposals have included: decreasing the Income Protection Allowance levels in the formula to determine Expected Family Contribution (EFC) and the income level at which students can automatically qualify for an EFC of zero; adding certain public benefits and tax credits to a student's income used to calculate the EFC; increasing the definition of full-time from 12 credits to 15 for Pell receipt; ending the Ability to Benefit provision that allows students without a high school diploma or equivalent to receive aid after showing they can succeed in college; eliminating Pell grants for students attending school less than half time; and further limiting the number of semesters students can receive Pell grants. CLASP has worked with other concerned organizations to analyze the harmful impacts of many of these cuts, and short briefs can be found on the CLASP ―Save Pell" webpage. The federal government should maintain a fervent commitment to preserving the maximum Pell Grant and protecting all low-income students' – and especially nontraditional students – eligibility for this critical program.

- Help Provide Nontraditional Students with More and Better Information on College Costs, Student Aid, and Other Financial Supports (low cost)

Student aid award letters sent by colleges are one of the most critical sources of information for students deciding whether to enroll in college and how to finance their education. However, existing letters are inconsistent across colleges and very often only include the most basic information about the cost of attendance and funding sources that are controlled administratively by the individual institution. But, student decisions about how to fund their education are complex and may include funding sources outside of those offered by the institution. In addition, for non-traditional students, the additional costs associated with attending college, such as transportation, child care, and lost wages if they must work fewer hours to attend classes, may constitute a significant financial burden.

The federal government should provide leadership and guidance to colleges to position student aid award letters as better sources of information and as educational tools that help students better understand the true costs of college and develop a plan for funding their education. This could be done by requiring institutions to notify students of other non-institutional benefits for which they may be eligible, such as food stamps and child care assistance; structure the financial aid award letter as a tool that can help students develop a budget and help them plan for any outside expenses; and follow a clear and consistent format so that students can compare financial aid offers from multiple colleges. There are additional ways to provide this valuable information and assistance to non-traditional students, but reforming aid award letters is a meaningful start.

- Lead an Interagency Initiative to Help Nontraditional Students Access Additional Financial Supports (low cost)

Lack of affordability is often cited as the biggest barrier to nontraditional students being able to access, persist in, or complete postsecondary education. In light of the growing net costs of college due to increasing costs and stagnant per-student financial aid, needy nontraditional students would benefit from more information on other financial resources for which they qualify, including other education and training resources, food stamps, public health benefits, etc. The Department of Education should spearhead an initiative in partnership with ETA, OVAE, ACF, the Department of Agriculture, and other relevant federal agencies to provide guidance to colleges on how to help financially needy nontraditional students access additional financial supports in addition to student financial aid for which they quality. Also, federal agencies can provide information about college and financial aid in public benefits offices, one stop career centers, libraries, etc. With more of their financial burden covered, low-income nontraditional students could work fewer hours, dedicate more time to their studies, and reduce their levels of stress associated with constantly worrying about and cobbling together financial resources. These are important elements to helping them persist in college and earn credentials.

- Change the Funding Regulations and Allocations in the Federal Work Study Program to Provide More Benefit for Nontraditional Students and Institutional Equity in the Program (low cost) and Increase Funding for the Program

Many nontraditional students are low-income and must work while they pursue a credential or degree. Although these students could greatly benefit from the Federal Work Study program (FWS), few have any access to it. The federal government should change the regulations in the FWS or conduct a pilot to allow FWS funds to be used to subsidize wages for low-income students to work for small employers ***in exchange for*** the employer providing reduced and more flexible work schedules that allow students to continue their employment and complete their studies more quickly. The pilot would include both currently employed students and their small business employers (this would require a change or a waiver of the current regulation that students cannot be employed under FWS if they otherwise would have been employed by that employer), as well as provide an incentive for small businesses to hire new working students and provide scheduling flexibility for them to attend school. The current allowance for schools to use FWS funds with private, for-profit employers should be maximized to assist as many low-income working students as possible. Additionally, the pilot should allow a small amount of funds to pay for full- or part-time job developers since lack of staff to arrange off-campus placements is a significant barrier to wider use of this provision. This type of pilot program with FWS funds would help nontraditional working students better balance work and school and help small employers retain good workers who are motivated and investing in their education.

The federal government also should update the method of distributing FWS funds among colleges so that these funds flow to institutions with the least resources and the largest concentrations of needy students. The badly outdated FWS distribution formula disproportionately allocates funds to institutions with fewer needy students. For example, ―Columbia University receives more than five times as much in work-study allocations as Florida State University, although Florida State has more than five times as many undergraduates, a much higher proportion of whom qualify for Pell Grants."[17] Also, 57 percent of undergraduates receiving FWS are from families earning over $50,000 annually (1 out of every 5 is from a family earning over $100,000 annually).[18]

The old formula should be gradually phased out, and the funds increasingly distributed proportionately to institutions that have the most financially needy students. Finally, the federal government should increase funding for FWS in conjunction with these changes. Given the growing unmet financial need low-income

nontraditional student face and the pressure on the Pell Grant program due to its significant growth, revisiting FWS funding may be a more viable option for increasing aid to needy students.[19]

Complexity of Navigating College and Careers

In addition to assisting nontraditional students with college costs, the federal government can play a role in decreasing the complexity of navigating college and careers – a significant stumbling block for nontraditional students. CLASP's primary recommendation to address this barrier is below.

- Pilot “Student Success Grants” to Colleges to Provide Promising Program Innovations and Student Services That Help Nontraditional Students Succeed (low cost)

Innovations in student supports and student financial aid have shown promise in helping nontraditional students persist in college, e.g., MDRC's Opening Doors initiative and research by the Community College Research Center at Teachers College at Columbia University. The federal government should build from these promising findings with a federal pilot program. Specifically, CLASP recommends a pilot program in which colleges receive additional funds for every Pell Grant student enrolled to offset the costs to the college of providing the kinds of program innovation and student services that research suggests will help students persist and complete college.[20]

Program innovations to test could include curricular redesign to support contextualized and accelerated remediation and providing work study jobs with private employers in the student's field of study. Promising student services may include intensive advising and counseling, college and career success courses, tutoring, and assistance with child care and transportation. The pilots should target students most in need, including those requiring developmental education and the lowest income students. Congress authorized, but did not fund, a similar pilot program called Student Success Grants with the authorization of the Higher Education Opportunity Act in 2008. This concept should be revisited and revised based on the latest research.

[1] *Profile of Undergraduate Students: Trends from Selected Years, 1995-96 to 2007-08,* U.S. Department for Education, National Center for Education Statistics, September 2010, http://nces.ed.gov/pubs2010/2010220.pdf.
[2] *Apply to Succeed: Ensuring Community College Students Benefit from Need-Based Financial Aid,* The Advisory Committee on Student Financial Assistance, September 2008, http://www2.ed.gov/about/bdscomm/list/acsfa/applytosucceed.pdf.
[3] *Trends in Student Financing of Undergraduate Education: Selected Years, 1995–96 to 2007–08*, NCES Web Tables, U.S. Department of Education, January 2011, NCES 2011-218.
[4] Thomas Bailey, Heather Wathington, and Tom Brock, Developmental Education: What Policies and Practices Work for Students, webinar, National Center for Postsecondary Research, December 15, 2010.
[5] *Yesterday's Nontraditional Student is Today's Traditional Student*, CLASP, June 29, 2011, http://www.clasp.org/admin/site/publications/files/Nontraditional-Students-Facts-2011.pdf.
[6] David Prince, *Opportunity Grant Report*. Washington State Board for Community and Technical Colleges, Research Report 11-2, January 2011.
[7] Josh Bone, *TANF Education and Training: Kentucky's Ready to Work Program*. Center for Law and Social Policy, January 2010.
[8] *Promoting Career Pathways Through Greater Education and Training Options: Kentucky's TANF Collaboration*, August 18, 2011 presentation at Region IV TANF conference, Shauna King-Simms, Director of Transitions Programs, Kentucky Community & Technical College System.
[9] Greg Hager, et al., *Improving Fiscal Accountability and Effectiveness of Services in the Kentucky Transitional Assistance Program,* Legislative Research Commission Program Review and Investigations Committee, June 20, 2004.
[10] Davis Jenkins. *Career Pathways: Aligning Public Resources to Support Individual and Regional Economic Advancement in the Knowledge Economy.* Workforce Strategy Center, August 2006.
[11] Matthew Zeidenberg, Sung-Woo Cho, and Davis Jenkins, *Washington State's Integrated Basic Education and Skills Training Program (I-BEST): New Evidence of Effectiveness (CCRC Working Paper No. 20),* Community College Research Center, 2010.
[12] See the body of research on this summarized in *Beyond Basic Skills.* See also W. Charles Wiseley, Ed.D, *Effective Basic Skills Instruction: The Case for Contextualized Developmental Math*, PACE Brief 11-1, Stanford University, January 2011; and the eight papers in the Community College Research Center's Assessment of Evidence series, listed in *Introduction to the CCRC Assessment of Evidence Series,* Thomas Bailey, Shanna Smith Jaggars, and Davis Jenkins, CCRC, Columbia University, January 2011.
[13] *Trends in Student Financing of Undergraduate Education: Selected Years, 1995–96 to 2007–08*, NCES Web Tables, U.S. Department of Education, January 2011, NCES 2011-218.
[14] Elizabeth Lower-Basch, *The Cost of Learning: How Public Benefits Create Pathways to Education,* Spotlight on Poverty and Opportunity, June 13, 2011.
[15] Mark Kantrowitz, ―Targeting of Student Aid Programs According to Financial Need", April 29, 2009, http://www.finaid.org/educators/20090429TargetingStudentAid.pdf; ―When It Comes to Saving Pell Grants, Colleges May Be Their Own Worst Enemy," Stephen Burd, Higher Ed Watch, September 22, 2011, New America Foundation, http://higheredwatch.newamerica.net/blogposts/2011/when_it_comes_to_saving_pell_colleges_may_be_their_own_worst_enemy-58027.
[16] Marcie Foster, Julie Strawn, and Amy Ellen Duke Benfield, *Beyond Basic Skills: State Strategies to Connect Low-Skilled Students to an Employer-Valued Postsecondary Education*, March 4, 2011, http://www.clasp.org/admin/site/publications/files/Beyond-Basic-Skills-March-2011.pdf.

[17] Judith Scott-Clayton, ―A Jobs Program in Need of Reform," New York Times, September 9, 2011, http://economix.blogs.nytimes.com/2011/09/09/a-jobs-program-in-need-of-reform/#more-13079.
[18] Ibid.
[19] Some of these ideas and others that are similar were recently proposed by Jamie Merisotis, the President of the Lumina Foundation, in a Huffington Post article: http://www.huffingtonpost.com/jamie-merisotis/workstudy-is-about-work-a_b_969017.html. Also, Judith Scott-Clayton of Columbia University's Teachers College recommended reform of FWS to better target truly needy students, to provide more substantive job options, or to consider allowing students to get a grant instead of FWS in this New York Times blog: http://economix.blogs.nytimes.com/2011/09/09/a-jobs-program-in-need-of-reform/#more-13079.
[20] All of the programs described in the comments addressing question #2 in this document have been researched and have shown positive results; many if not most would be prime models for this pilot program. Additional research from the Community College Research Center at Columbia University's Teachers College has found positive results from several program models. See CCRC's Assessment of Evidence Series: http://ccrc.tc.columbia.edu/Publication.asp?UID=845.

Testimony
on
Post-Traditional Students
in behalf of
Hearing by Advisory Committee
On Student Financial Assistance

Washington, DC
September 30, 2011

Presented by:
John F. Ebersole, LPD
President
Excelsior College

Introduction

I am John Ebersole, president of Excelsior College in Albany, NY. My institution has a current enrollment of 31,000 post-traditional students with an average age of 39. Excelsior was established by New York's Board of Regents, originally as "Regents College", in 1971. The College's mission is to assist those not well-served by traditional higher education. It is a leader in prior learning assessment and degree completion.

In addition to being a post-traditional learner myself (all degrees have been earned while engaged in full-time employment), I have served as president of the University Continuing Education Association (now UPCEA) and currently chair the American Council on Education's Commission on Lifelong Learning. I also serve on the U.S. Chamber of Commerce's Workforce Development Task Force and am a member of the Board of Directors for New York's Council of Independent Colleges and Universities.

I have been involved in adult, continuing and distance education for more than 25 years. Prior positions have included dean of Management at John F. Kennedy University (America's first accredited institution to focus solely on the needs of working adults), assistant dean and director of strategic initiatives for the University of California, Berkeley Extension, and Associate Provost positions at both Colorado State and Boston University.

I have just published a book on the challenges facing post-traditional learners, *Courageous Learning*, with William Patrick. It profiles the successes of representative adult students and provides details on tools that helped them earn a degree.

Question 1: What are the primary barriers to access and persistence for post-traditional students?

- When post-traditional students are surveyed as to the factors that prevent their enrollment in graduate or under-graduate degree completion programs, the consistent response is "lack of time", followed by "lack of awareness of suitable options," and "cost" – usually in that order.

- Despite the good intentions of many traditional institutions, one of the biggest barriers is the lack of alternatives to the time and place specific formats of most offerings aimed at post-traditional students. Evening and weekend models have been an advancement over week-day formats, but are not possible for many busy, working students, especially for most emergency and shift workers. While proprietary higher education has aggressively worked to fill this need with asynchronous online offerings, few not-for-profits providers have followed suit, especially at the undergraduate level.

- Within recent years, two additional barriers have emerged – the lack of a high school diploma, and lack of the academic skills necessary to be successful. U.S. Department of Education statistics show that the country now has 23 million high school drop-outs and that this number is growing by 1.5 million per year (twice the rate of GED completions).

  Additionally, it is estimated that between one-third and half of those entering community college need remediation in math or English composition, or both. Of these, three-fourth fail to graduate in four years, according to the Virginia Community College System (Jennifer Gonzales, "VA community colleges dive head first into remedial math redesign". *The Chronicle of Higher Education* online, July 31, 2011.)

- As for persistence, it is my strong belief that the number one reason for non-completion in a post-traditional program is a **lack of self-confidence** on the part of the student. While often difficult to acknowledge, many older students when asked, will say that school was not easy for them at a traditional age. They return to school with great uncertainty as to their skills and capability. For these students, it is much easier to say that other factors are the reason for their withdrawal. "Real" reasons may include cost, lack of support, the need to repeat academic work, and life. Let's look at each of these:

  - Cost is a major concern for many returning students, particularly for those who have lost their job or have a family member who is unemployed. Additionally, Excelsior's two largest student groups – active duty military and vocational/practical nurses – have unique challenges in this regard. Military tuition assistance has been capped at $250 per credit for several years and is now actually being reduced by the Navy to $200. Tuition above these levels, fees, and books are the responsibility of the student. This poses a potential hardship for both those in the lower military pay grades who are now facing a reduction in tuition assistance, as well as for nurses at the LVN/LPN level.

  - Excelsior's associate degree in nursing is the College's largest program (with an enrollment of some 14,000). Yet, these students cannot qualify for Title IV aid because of the Department of Education's ruling that its independent study format does not meet their criteria for entitlement, despite its 35 year history, 40,000 graduates and multiple designations as a "Center of Excellence in Nursing" by the National League of Nursing and as a "top school" for men in nursing. Given the students average income of less than $35,000, this is a particularly needy group and one where withdrawals are highest.

  - Lack of employer and/or family support are often cited as reasons for dropping-out. Frequent job related travel is also given as a reason for leaving traditional time and place specific programs.

  - The unwillingness of traditional institutions to accept previous academic work or American Council on Education (ACE) recommended credit is frequently given as a source of frustration and can be a barrier to both entry or completion. The Council on Adult and Experiential Learning (CAEL) has conducted research that

shows that those given credit for prior learning are significantly more likely to persist, and graduate, than those who do not receive such credit. This is particularly problematic with military members and their families that move around and earn substantial credit from a multitude of institution. They are often asked to start over or repeat previously earned credits because of institutional residency requirements.

- A final reason has to do with the vicissitudes of life – illness, children, family death, divorce, loss of job, move, etc. Key to these individual's eventual return and success is tracking, periodic communication and a genuine sense of caring. Many of Excelsior's graduates have dropped in and out of their programs, over a number of years, before ultimately graduating. This needs to be understood and accepted as one of the challenges associated with older students.

<u>Question 2:</u> What are the most promising state and institutional strategies for overcoming the above barriers?

<u>State Strategies:</u>

- For years, many states have provided higher education funding through special "authorities" that provide institutional support for high need programs (teacher education, nursing, law enforcement), as well as low cost student loans and grants. In light of current budget reductions and economic gloom, these programs are in retreat.

- Recent, high profile actions by the states of Indiana, Washington and Texas have designated Western Governors University as an "instate provider" for purposes of access to state support, By doing so, these states have provided their citizens access to a respected, relatively inexpensive, not-for-profit institution that combines online learning and competency assessment.

- Kentucky, Colorado and Washington have created easy access online community colleges that leverage the offerings of their entire systems. Kentucky has recently contracted with Blackboard to help with a system-wide retention and student success project.

- Maine's Higher Education Partnership appears to be a model of instate collaboration between public institutions. It provides for alignment between the community colleges and upper division universities, creates joint outreach centers and purports to provide certain budgetary savings – thereby helping to contain costs.

- The oldest and most proven state strategies are those of New York, New Jersey and Connecticut. These three states have created institutions specifically to assist post-traditional learners complete an undergraduate degree, regardless of state residency. The institutions – Excelsior and Empire State in New York; Charter Oak in Connecticut and Thomas Edison State in New Jersey – assess prior learning, accept American Council on Education credit recommendations for military and corporate training, offer online instruction and have

minimal, if any, residency requirements. They also have sophisticated credit transfer policies that maximize the acceptance of prior coursework within approved degree frameworks. In fact, in 2010, Excelsior accepted credit in transfer that would have cost students (and/or taxpayers) $190,000,000 if they had been required to repeat this work at Excelsior's tuition rate of $355 per unit. Most adult learners are only able to attend college part-time because of other life obligations, so these sophisticated credit transfer policies are very attractive for older students seeking degree completion sooner.

Institutional Strategies

It is my opinion those institutions achieving the highest retention and completion rates are those that take a holistic view of the entire degree completion process. This extends from allowing a prospective student to have a classroom or online experience before they make a commitment to a particular program. Once enrolled, their writing and math skills are assessed (for possible remediation), they are provided with an orientation to both the institution and the student support systems that are available to help them, and, if in an online program, they are oriented to the technology they will be expected to use.

Those students thought to be most at risk (low prior GPA, multiple transcripts, lacking focus or motivation) as seen in their "statement of purpose" are flagged for special attention by academic advisors and/or an external coach. Excelsior works with a private contractor, InsideTrack, to provide "life coaching" to its at risk students. This includes help with time and money management, establishing support systems with family, employer, and fellow students, as well as providing study skill tips. Students are contacted by phone on a weekly schedule.

Anecdotal evidence suggests that most students withdraw, or disappear, within their first two to three terms. If they can be helped to be successful in these initial courses, odds go up dramatically in favor of their ultimate success. This is assumed to be a factor of gaining self-confidence and of having established routines that work for both them and those around them.

A study done at Rio Salado College shows the success of students that engage with the learning process early (the first day of class). Advisement and communication strategies to strongly encourage early participation in course work appears to lead to overall student success.

In addition to coaching and pro-active academic advising, many institutions now provide professional subject matter tutoring on a 24/7 basis, as well as online study groups, peer networks and technical support (online).

Evidence exists that cohort formats contribute to student retention. The relationships and loyalties that contribute to group cohesion can provide both psychological and academic support during periods of need.

Student surveys continue to find that the single greatest contributor to student success, at the course level, is a caring instructor. Instructor responsiveness and comprehensive feedback are highly valued by students regardless of the form of instruction – online or classroom. In the online environment, this includes requiring weekly participation through meaningful postings in

class discussion, offering an assessment of a question or problem, and submission of an assignment.

Research by the Council in Adult and Experiential Learning has found that these students receiving credit for prior learning tend to complete their degrees at higher rates than those that do not. Conversely, it has also been found that an institution's unwillingness to accept prior course work in transfer, or to allow for credit-by-examinations, is a frequent source of student frustration and loss of motivation.

For those faced with financial concerns in returning to school, several institutions provide payment plans which allow for staged, steady-state payments over time, as well as access to loans and institutional scholarships. Others allow students to complete needed work at lower cost public institutions, and then, transfer the resulting credits back to fulfill their degree plan. Growing in popularity is the earning of credit-by-examination. Using CLEP, ETS or Excelsior examinations, students are able to validate prior learning in specific subjects and apply the resulting credit to their degree. Preparation for these examinations is available for free using the online courses that are now available through the Open Learning Consortium and the Open Educational Resource (OER) initiatives. A typical credit-by-examination assessment costs the student approximately $100 – for up to five credits. Again, leading to degree completion more quickly and less expensively.

<u>Question #3:</u> What role should the federal government play in encouraging institutions to implement best practices?

- Fund demonstration projects that are evaluated on the basis of <u>both</u> learning outcomes and graduation rates.
- Spotlight best practices at all levels of higher education, not just community colleges.
- Increase awareness of existing programs, and practices such as credit-by-examination, that can help post-traditional students complete an affordable degree.
- Encourage states to remove requirements that impede access to regionally-accredited online institutions.
- Promote more collaboration between all types of institutions of higher education to allow flexibility and allow adult students to complete their degrees sooner.
- Extend Title IV entitlement to independent study, credit-by-exam and prior learning assessment methods that reduce the overall cost of degree attainment to both tax payers and the students Federal aid serves.
- Adopt student loan policies that penalize institutions, not students, for unwillingness to accept otherwise appropriate credits in transfer.

- Encourage the Department of Education to deepen its understanding of the power, quality, flexibility and potential of online learning, and to no longer see it as synonymous with for-profit education.

- Encourage, not thwart, innovation.

- Act as convener of fora to spotlight both the need for greater innovation and the best practices of those with experience serving the needs of this student population.

Statement of Tom Flint
Vice President for Regional Accreditation, Kaplan Higher Education
for the Advisory Committee on Student Financial Assistance
September 30, 2011

Good afternoon. I am Tom Flint, Vice President for Regional Accreditation, at Kaplan Higher Education. I am pleased to be invited to share some ideas with the Committee today on strategies to increase degree and certificate completion among non-traditional students.

Kaplan Higher Education broadens access to postsecondary educational opportunity with a priority on seeing our graduates succeed academically and professionally. We serve over 70,000 students, focusing largely on persons who have been underserved by traditional higher education. Through the online offerings of Kaplan University and other Kaplan-affiliated schools, we provide outcomes-based programs ranging from diplomas to graduate and professional degrees. Kaplan Higher Education institutions are accredited by one of several regional or national accrediting bodies recognized by the U.S. Department of Education. Kaplan Higher Education is part of Kaplan Inc., which is a subsidiary of The Washington Post Company.

Today's hearing focuses upon three overarching questions. The first is:

- **What are the primary barriers to access and persistence for nontraditional students?**

Thirty years ago Pat Cross[1] categorized these barriers for adult learners as stemming from dispositions, situations, and institutions. In other words, the barriers can be psychological, pragmatic, and bureaucratic.

The psychological barriers won't concern us today because the purpose of policy-making is not to tell people what they should believe. The pragmatic barriers for adults have long been understood to show up in two major forms: time and money.

Time is a barrier because non-traditional students have so much less of it compared to those 18-21 years old. Most of the identified "risk-factors" of non-traditional students perfectly describe the adult learner: working full-time while enrolled, financially independent, attending school part-time, having dependents, being a single parent, and

[1] K. Patricia Cross, Adults as Learners: Increasing Participation and Facilitating Learning. San Francisco: Jossey-Bass, 1982.

delayed or interrupted college enrollment.[2] In short, adult learners have real-world commitments they cannot avoid. Colleges and universities cannot create more hours in the day for adult learners, but they can find ways to avoid wasting the time of adults by being less bureaucratic.

Lack of money is a pragmatic barrier about which this Committee has devoted considerable time and attention over the years. Lack of money negatively impacts college access and persistence.[3] The Committee's June 2010 report concluded that "grant aid from all sources is not adequate to ensure access and persistence of qualified low- and moderate-income students."

Shortages of time and money intersect with the question of institutional bureaucratic barriers facing adult students. Today's second question for the hearing is:

- **What are the most promising institutional strategies and policies for overcoming the barriers of access and persistence by adult learners?**

There are (often underutilized) strategies and policies at institutions that can create access and promote persistence by adult students because they save both time and money. Foremost among them is the assessment of students' prior learning.

Prior Learning Assessment (PLA) is vital to adult learners returning to college. Broadly, PLA covers not only experience-based learning from one's life and work, but also transfer credits earned elsewhere which adults wish to apply towards degrees. The fundamental principle here is – "what you know is more important than where you learned it." The Council for Adult and Experiential Learning (CAEL) is an international clearinghouse and sponsor of research on PLA; its library of research shows that:

- Students earning bachelor's degrees with PLA credit ("PLA students") saved an average of between 2.5 and 10.1 months of study compared to non-PLA students earning those degrees.

- PLA students are much more likely than non-PLA students to earn a degree (at both bachelor's and associate's levels), regardless of the size or type of institution, student academic ability, student background characteristics, or receipt of Title IV aid.

- For students not earning degrees, PLA students were more persistent in terms of credit accumulation than non-PLA students, and PLA students had higher re-

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[2] Nontraditional Undergraduates: Findings from the Condition of Education 2002 (NCES report 2002-012. Washington, DC: National Center for Education Statistics, 2002.
[3] Advisory Committee on Student Financial Assistance, The Rising Price of Inequality: How Inadequate Grant Aid Limits College Access and Persistence. Washington, DC: June 2010 and Mortgaging Our Future: How Financial Barriers to College Undercut America's Global Competitiveness. Washington, DC: September 2006.

enrollments for multiple years of study compared to non-PLA students (who were more likely to drop in the first year of study).

- PLA students have higher grade point averages compared to the general college student population.[4]

CAEL advocates for much more than PLA. In my prior work as CAEL's Vice President for Lifelong Learning and Research, I was the principal investigator in a multi-year study of policies and practices at high-performing, adult-serving colleges and universities. This work, called the "Adult Learning Focused Institution" (ALFI) project, identified many additional practices that address the pragmatic barrier of time as it affects adult learners' access, persistence, and success in college.[5] Among those practices:

- Online learning – My own institution, Kaplan University, has grown from an initial class of 34 students in three online higher education programs in 2001 to nearly 50,000 students in over 90 programs today. This growth is but one example of the enormous pent-up demand for convenient, accredited degree programs.

- Non-traditional operating hours and seasons help working adults because so many of them simply cannot attend daytime classes at a campus. Flexible colleges offer classes year-round and on the third shift, and some go so far as to shift their class schedules mid-term if working students find that their work schedule has shifted. Adult-centered colleges have set up classes in workplaces and shopping centers, and have shipped textbooks direct to learners rather than require a trip to the campus bookstore.

- Multiple entry and exit points put the control of time into the hands of adult learners. Kellogg Community College (Michigan) has successfully implemented this approach in certain technology departments. Students enter and exit as their schedules permit, master tasks in a competency-based framework, and earn fractional credit hours for discrete learning that is nonetheless applicable toward degrees.

- Modularized curricula, or 'block' scheduling of courses on a compressed or accelerated schedule, with more frequent turnaround times. Research by the Center for the Study of Accelerated Learning at Regis University has demonstrated the effectiveness of accelerated delivery.

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[4] Fueling the Race to Postsecondary Success: A 48-Institution Study of Prior Learning Assessment and Adult Student Outcomes. Chicago: CAEL, 2010.

[5] Thomas Flint & Associates, Best Practices in Adult Learning: A CAEL/APQC Benchmarking Study. New York: Forbes Custom Publishing, 1999. Also: Thomas Flint, Paul Zakos, & Ruth Frey, Best Practices in Adult Learning: A Self-Evaluation Workbook for Colleges and Universities. Dubuque, IA: Kendall-Hunt Publishing, 2002.

- Cohort-based student tracking that permits adults to continue their in-class connections to peers throughout their programs, creating in effect a continuous study group that provides a social network for both learning and motivation.

When bundled together in an integrated manner, these institutional practices help overcome barriers of time, place, and tradition that too often stand in the way of adult learners.

From an adult learner perspective, time, money – and frankly ego – are put at some risk by enrolling in college. A key strategy at Kaplan University to lower those risks is a new program this year called the Kaplan Commitment. The Kaplan Commitment offers new students five weeks to ensure they are academically and financially committed to their education without a financial obligation to Kaplan (other than a minimal administrative fee). This initiative is designed to make sure that our students are comfortable with their chosen course of study, understand the obligations they're about to undertake, and can show that they are handling college-level work. We believe this new program will increase student retention, persistence, and completion because both Kaplan and the student agree that we have a good fit. As you know, Iowa Senator Tom Harkin is no fan of for-profit higher education, but at a recent Senate hearing[6] he praised Kaplan for taking the unique and significant step of implementing the Kaplan Commitment.

This brings us to today's third question:

- **What role should the federal government play in encouraging states and institutions to implement best practices?**

Neither federal nor state governments can compel institutions to adopt the approaches I have mentioned. The practices I have mentioned require genuine commitment by colleges to remove every irrelevant obstacle facing their students. In terms of policy leverage, federal funding through Title IV programs and federal regulation exert enormous influence on institutions, so here is where the federal government can help encourage institutions to implement best practices to enhance student persistence.

One positive example is the June 7, 2011 Dear Colleague issued by the Department of Education providing guidance to institutions on implementing "trial" or "conditional" enrollment periods that allow students to attend classes before making a financial commitment – similar to the Kaplan Commitment. Such positive roadmaps provide more regulatory clarity that facilitates the implementation of effective practices. Similarly, federal regulations could better reinforce the principle (cited above) that "what you know is more important than where you learned it."

One case in point is the new Credit Hour regulation issued by the Department in its Program Integrity regulations that became effective on July 1, 2011. As many of you will know, the regulatory definition of a Credit Hour begins with these 20 words:

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[6] U.S. Senate Committee on Health, Education, Labor, and Pensions hearing conducted June 7, 2011.

...a credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement ...

In short, the Credit Hour is a proxy for student learning – it refers to work leading to student learning outcomes. However, rather than focusing next upon what methods can be used to certify that student learning has been achieved, the regulation instead proceeds at length to describe recognized ways to acquire learning.[7] In other words, attention is heaped upon learning delivery instead of ways to recognize learning outcomes. As a result, Prior Learning Assessment is being diminished.

Institutions are funded via the Credit Hour for delivering courses, and course credits are the driver of tuition and fee pricing. The pre-college experiential learning of adults is not sponsored by the institution, so PLA credits are not funded under Title IV. Students who present learning portfolios must pay out-of-pocket fees to have colleges use their faculty to assess and validate that evidence of college-level learning. Nor are institutions paid to accept course credits from elsewhere.[8] They are not paid to assess entering students' knowledge, skills, or abilities, nor are they paid to assess those traits of their current students except in connection with the courses that faculty members are delivering.

Yes, part of what is paid by Title IV funds via credit hours in traditional course delivery is the time spent by faculty members grading student work via tests, papers, and projects in courses delivered to judge whether or not the required student work has been performed and is verified by evidence. So, although the regulation only tacitly provides for it, the precedent in Title IV is established: college faculty should be paid for their time spent in assessing student learning, as surely as time they spend for instruction.

I would assert that we have an under-appreciated opportunity here: Let's financially support the time that faculty members spend in assessing the achievement of college-level student learning, apart from course delivery. After all, the proper way to design learning experiences and courses is to begin with needs assessment, including an initial assessment of how much the participants already know about what the course is intended to teach.

My view of why many of the practices like PLA are found at the margin within higher education is because the government lacks provisions to fund or incentivize those practices. The hidden message from lack of such financial support is that those

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[7] The regulation continues saying "...that is an institutionally established equivalency that reasonably approximates not less than—(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester hour or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different period of time; or (2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours."

[8] Speaking of a decision not to accept automatically transfer credit from an ACE-accredited source, the provost of Fort Hayes University (KS) said in a Chronicle of Higher Education story published September 20, 2011, "Why would we accept coursework in and not get revenue for it?"

practices are not valued, and because they are not valued, they are viewed as lacking legitimacy to which, in fact, research shows they are entitled. If we can find ways to fund such practices as the assessment of prior learning, then I predict that colleges will break through bureaucratic barriers to adopt the credit-recognition practices like PLA that are shown to be beneficial for student persistence and success. If we fund better credit-recognition practices, we will quit wasting time and money in the delivery of course content and learning outcomes that students have already acquired. If we do that, we can expand access and promote student retention and success.

Thank you for this opportunity to share these views with the Committee.

Testimony of Natala K. Hart
Director, Office of Economic Access
The Ohio State University
September 21, 2011

Established in 1870, The Ohio State University is one of the largest, most comprehensive land grant universities in the United States. The main campus, located in Columbus Ohio, is home to more than 55,000 students, 14 colleges, 175 undergraduate majors, and 240 masters, doctoral, and professional degree programs. As Ohio's best and one of the nation's top-20 public universities, Ohio State is further recognized by a top-rated academic medical center and a premier cancer hospital and research center.

An additional 8,200 students attend Ohio State's regional campuses in Lima, Mansfield, Marion, and Newark, and the Agricultural Technical Institute in Wooster. Our five regional campuses offer open admission to all Ohio high school graduates. As classes begin today, we expect record enrollment at all of Ohio State's campuses for academic year 2012.

Supporting non-traditional student success is vital to the success of The Ohio State University AND to the State of Ohio. While the majority of students who attend Ohio State on our main campus are traditional students, the majority of students on our regional campus are non-traditional students. Nonetheless, even a small percentage of non-traditional students at an institution of Ohio State's size results in a significant contribution to higher education in our state.

We know that the solution to economic recovery at the local, regional, and national level is best met through education. Unfortunately only 32 % of Ohioans have associate degrees or higher. We must do better.

Research completed by the Higher Education Research Institute at UCLA has shown that best way to encourage children to go to college is to have one of their parents attend college. It often has as much as a three generational affect as shown by Blueprint College (Ohio State). When parents learn how to send their children to college, they often think about going to college themselves. An example of this can be found in this video.
http://www.osu.edu/watch/457b7x35rGYAo

Non-traditional students enhance the educational experience of ALL students at Ohio State. We want our classroom not just to study the external environment, but reflect the external environment. Our classrooms should reflect world around them. Non-traditional students are highly desired by faculty because their life experiences, when shared, benefit traditional students in the classroom. They also tend to value their higher education experience and are often outstanding performers in the classroom.

In my testimony today, I would like to recognize three important programs at Ohio State that support key non-traditional student groups and provide examples of how we support these non-traditional groups on campus. Finally, I will provide four recommendations on how to better support non-traditional students.

While this list is not exhaustive, below are three important non-traditional student populations at Ohio State:

- Regional Campuses: As stated above, the majority of our non-traditional students are enrolled at one of our five regional campuses. They offer degrees and programs that are of importance to the local community, such as education, business, and health professions. Regional campus students at Ohio State are often "place-bound" due to family or occupation. In addition to traditional classroom settings, research opportunities for students are available at our regional campuses. This is an important link to the research enterprise at Ohio State. Additionally, we facilitate the process of students changing campuses-- rather than a complex transfer process--when a desired degree, such as physics, requires a move to the main campus in Columbus. http://www.osu.edu/acrossthestate/index.php#
- Veterans: The current veterans' population is demographically different than prior cohorts of veterans. At Ohio State this population includes more first generation and female students, and tends to come from lower income backgrounds.
- Women: Through private donors and the Coca-Cola Corporation, Ohio State has a long standing program for non-traditional female students. This program is called the Critical Difference for Women. It provides

both scholarships and services for women returning to college. These students are women who either dropped out of college or never attended, due to family circumstance or because they were never encouraged to attend college. Under the broader umbrella of the Women's Place, this reflects an effort to serve women students, faculty and staff across the university. http://criticaldifference.osu.edu/ http://womensplace.osu.edu/

Ohio State supports the success of non-traditional students in a variety of ways. Below are just a few examples:

- **Transfer and Articulation**. The state of Ohio has some of the strongest transfer and articulation policies in the country. Students who attend Ohio's public institutions can determine, in advance, how their work will transfer toward degree completion and future desired institutions. We are the only state in the nation where not only do the credits transfer, but they are evaluated by faculty to ensure that they meet the degree requirements of the academic major of the student's interest. This means that prior college work more likely to contribute to long term degree objectives. The T&A policies in Ohio support a return on student aid investment, for past and present coursework. These policies give Ohio students an incredible advantage to attain degrees, and support students who may need to attend multiple institutions. This benefits non-traditional students because they are more likely to attend multiple institutions. http://www.ohiohighered.org/transfer/policy
- **Preferred Pathways**. Ohio State has gone even further by establishing the Preferred Pathways program which allows a student to begin at Columbus State Community College and complete their degree at Ohio State. The key to the program is focused academic counseling from the beginning of the program at Columbus State through the end of the program at Ohio State. http://www.undergrad.osu.edu/pathway/
- **Single Point of Entry Policies and Procedures.** At Ohio State we set policies that facilitate transparency and break down silos to help with

decision-making. For example, regional campus students who move to main campus must only register to change campuses, rather than submit a transfer and re-enrollment application. We guide these non-tradition populations through a large institution, focused on academic advising, with other activities like financial aid, transfer credit, academic progress. Ohio State also has established single “start” points for students, such as the veterans’ office, women’s place, and integrated student services center. These offices serve as one beginning point to financial aid, fee payment, and other academic services. At Ohio State, “middle managers” from key offices such financial aid, bursar, register, and student services regularly meet and interact. This effort diminishes the process barriers for all students, but has a particularly positive impact on non-traditional student groups because, more than any other group, they have less discretionary time to devote to administrative activities. Additionally, financial aid advisors will be assigned to work with academic advising offices regularly at key times during the year, such as on the add/drop date. Students can then talk to academic advisors and financial aid advisors at one time—and can know real time the impact of changes to their financial aid. This is done physically and virtually, and helps to lead to student success.

Recommendations to Enhance Non-Traditional Success

1. Provide robust financial aid for these populations. The year round Pell program supported non-traditional population because they more likely to remain enrolled year round and speed up degree completion. If degrees are completed more quickly, these students will be re-infused into the economy.

2. Change the qualifications under Title XX to allow graduate and professional students to obtain child care. Currently only students without a bachelor’s degree are eligible. It is a constant challenge for nontraditional students who are studying for graduate or professional

degrees to receive Title XX child care benefits. These students may work at low paying jobs to pay for school or be funded through Graduate Associateships. They are often below the poverty level according to state standards because of the low pay in these positions, but they cannot qualify for Title XX benefits because they have a bachelor's degree. This presents a substantial problem for single parents (usually nontraditional students) who are full time students and are charged a higher weekly rate for child care as private-pay customers. Lack of access to safe and quality child care can hinder students' academic productivity, matriculation, and overall quality of life.

3. Simplify the regulatory environment. Simplify getting in, simplify the FAFSA, and simplify the review process. We also need a streamlined process to reviewing non-traditional students' ability to reflect expected income while in school. Today the expected income estimate is done on a case-by- case basis.
4. Target support for non-traditional students for unexpected events. Issues like flat tires, unreliable child care, and expensive book or lab fees can derail non-traditional student success much more than traditional students. Over-award rules in financial aid process need to be adequately flexible for non-traditional students. Again, they have less discretionary time to appeal, and their needs tend to be much more immediate.
5. Provide access to experiential learning experiences. Financial aid should be available for the full range of academic experiences, including experiential learning, such as study abroad, research. The Simon Study Abroad Bill, initiated by the Association of Public Land Grant Universities, would provide scholarships to low-income students to study abroad. Universities can also initiate short-term study abroad and research programs that are more amenable in terms of time and cost to non-traditional students.
6. Encourage states to develop transfer and articulation processes such as the Ohio model to achieve benefits that disproportionately benefit non-traditional students.

Thank you for this opportunity to present written testimony. I will gladly respond to questions you may have. I am best reached through email at hart.149@osu.edu .

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16 East 34th Street
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475 14th Street, Suite 750
Oakland, CA 94612-1900
Tel: 510 663 6372
Fax: 510 844 0288

Performance-Based Scholarships: Emerging Findings from a National Demonstration

Testimony Submitted to the Advisory Committee on Student Financial Assistance

October 3, 2011

By Reshma Patel and Lashawn Richburg-Hayes
MDRC[1]

Increasing the academic success of students in college is a national imperative. Postsecondary enrollment has increased about 300 percent from just over 5.9 million students in 1965 to about 17.5 million students in 2005,[2] but college graduation rates have been fairly stagnant over the same period.[3] Despite the marked successes in college access since the passage of the Higher Education Act of 1965 — which extended need-based financial assistance to the general population for the first time — more work remains to be done to improve college persistence and completion rates.

Low-income students and nontraditional students are at particular risk of not persisting to complete a certificate or degree — often because of competing priorities, financial pressures, and inadequate preparation for college. Financial aid may improve access to and persistence in college for this population. Research suggests that financial aid is positively associated with increased enrollment[4] and positively associated with increased persistence.[5] One random assignment study that provided need-based grants to students attending public universities in Wisconsin found modest impacts on some academic measures.[6]

One emerging solution for improving academic success among low-income students is a performance-based scholarship, paid contingent on attaining academic benchmarks. A handful of studies have tested the effectiveness of such financial *incentives* for postsecondary students,

[1]MDRC is a nonprofit, nonpartisan education and social policy research organization. Reshma Patel is a Research Associate, and Lashawn Richburg-Hayes is Deputy Director of MDRC's Young Adults and Postsecondary Education Policy Area.
[2]Snyder, Dillow, and Hoffman (2008).
[3]Eaton (1997); Turner (2004).
[4]St. John et al. (2002); Kane (2004); Dynarski (2000, 2003); Cornwell, Mustard, and Sridhar (2006).
[5]Leslie and Brinkman (1987); St. John et al. (1991, 1994, 2001); Cabrera, Nora, and Castaneda (1993); Choy (2002); DesJardins, Ahlburg, and McCall (2002); Bettinger (2004); Singell and Stater (2006); Scott-Clayton (2009).
[6]Goldrick-Rab, Harris, Benson, and Kelchen (2011) have experimental evidence of providing additional aid without any criteria or academic benchmarks associated. They find that recipients of the need-based grant were 28 percent more likely than other Pell grant recipients to have earned at least 60 college credits, over a two-year period.

finding modest impacts for some groups of students.[7] Unlike merit-based aid, performance-based scholarships focus on current and future performance rather than prior accomplishments. MDRC's Opening Doors study of performance-based scholarships in Louisiana showed that such a program had a number of positive effects for students, including students' credit accumulation, grades, and persistence.[8] The program targeted low-income parents, and, as a result, the study sample was comprised of older, unmarried, and mostly female students. Unfortunately, the devastation inflicted by Hurricane Katrina intervened partway into the study, making it difficult to confirm the program's long-term effects. Building on these promising findings, MDRC launched the Performance-Based Scholarship (PBS) Demonstration in four states in 2008, followed by an additional two states in 2010.[9]

While the programs in each state vary by target population, performance benchmarks, scholarship amounts, and the integration of student services (among other things), each study employs a random assignment research design, the "gold standard" in program evaluation. Random assignment creates two groups of students that are similar both in characteristics that can be measured, such as age and gender, and in those that are more difficult to measure, such as tenacity and motivation. As a result, subsequent differences in outcomes (for instance, enrollment rates) can be attributed with a high level of confidence to the PBS program rather than to the types of students who enroll in the program.

A number of the sites in the PBS Demonstration serve nontraditional populations, such as low-income parents in Ohio (similar to Louisiana) and older students in need of remedial education in New York. Additionally, all of the programs target low-income students, and the scholarships are paid directly to students, allowing them to use the funds for their most pressing needs, whether books, child care, or other financial obligations that may disrupt their studies. Importantly, the performance-based scholarships are paid in addition to Pell Grants — the main federal source of need-based aid — and other existing financial aid programs. In this way, students have more funds to cover academic and living expenses and can potentially reduce their dependency on loans.[10]

By conditioning additional financial aid on certain performance benchmarks, the programs seek to encourage students to focus more on their studies, which, in turn, should lead them to perform better in their classes in the short term. In the medium term, they should progress through their degree requirements at a quicker rate by increasing their term-to-term enrollment and their credits attempted and earned. Increases in these academic outcomes may then lead to long-term gains, including year-to-year persistence, more total cumulative credits earned, and graduation or

[7]Angrist, Lang, and Oreopoulos (2009); Leuven, Oosterbeek, and van der Klauuw (2006).
[8]Richburg-Hayes et al. (2009a); Brock and Richburg-Hayes (2006); Barrow et al. (2009).
[9]See Richburg-Hayes et al. (2009b) for an overview of the programs in each state.
[10]Financial aid regulations prohibit certain students from receiving financial aid in excess of their need. In these instances, federal work-study or loans may be displaced for the performance-based scholarship.

transfer to a four-year or more selective postsecondary institution. Finally, if the effects on academic outcomes remain positive and strong, the intervention could lead to improved labor market outcomes, including higher earnings.

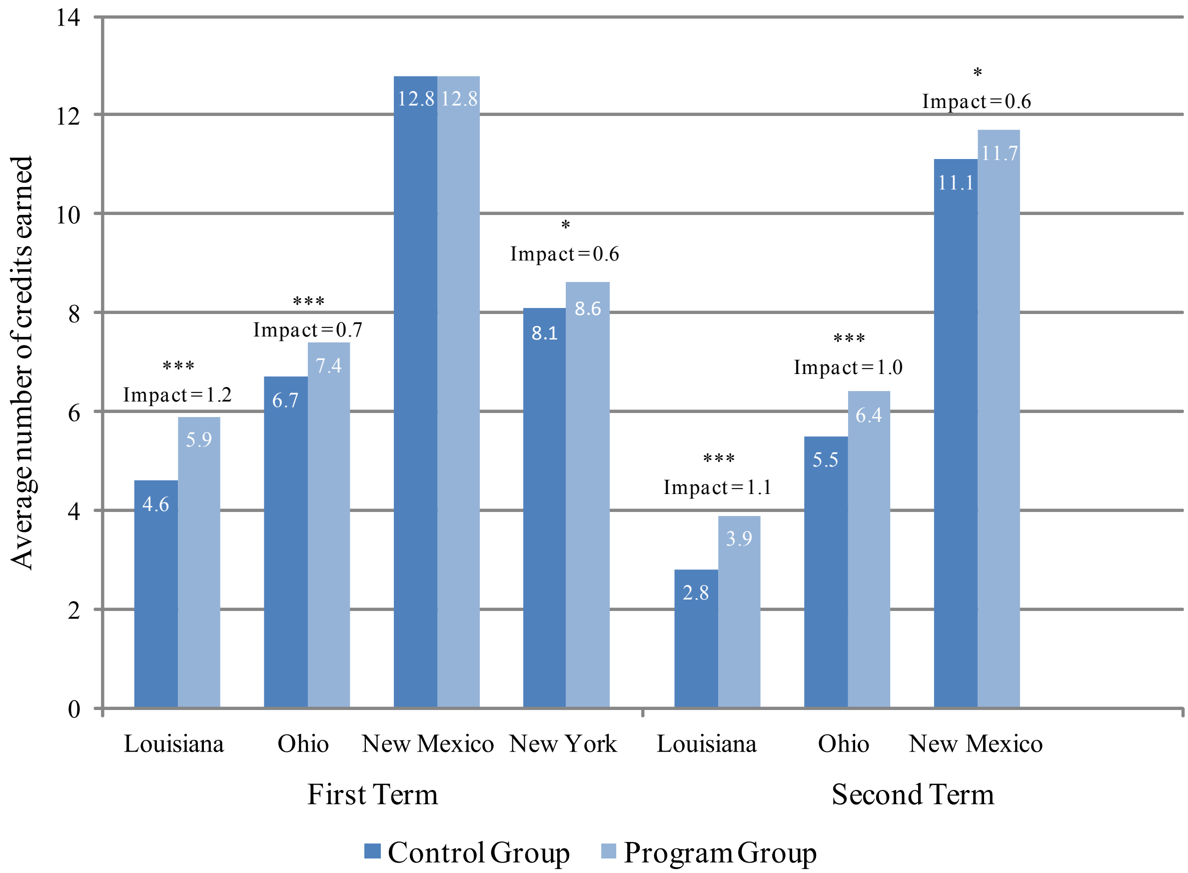
MDRC now has preliminary results from performance-based scholarship programs in New York, Ohio, and New Mexico, in addition to the original results in Louisiana.[11] While the effects vary across these sites, there are some commonalities in the emerging findings. All of the impacts described below are statistically significant, indicating that the differences reported are likely to be the result of the programs rather than of chance. [12]

- **Increases in credits earned**. All of the sites have found impacts on credits earned in one or more semesters or terms (see Figure 1). The Louisiana study saw an increase in credits earned, averaging 3.5 credits over four terms. In the Ohio program, which has a target population similar to that of Louisiana, the program group students earned an average of two full credits more than the control group students over two terms of study. The New York site, which targets independent students in need of developmental education, had an increase of 0.6 credits earned in the first term (results from later terms are not yet available). The New Mexico study, which is the only one housed at a four-year institution, found no impact on credits earned over the first academic year, but showed an increase of 0.6 credits in the second term. While these impacts seem fairly modest, the increase in credits can sometimes account for one full course toward a student's degree requirements, essentially shortening the time to degree completion by that amount.

- **Greater impacts in the second term.** All sites, including the original Louisiana study, showed an increase in credits attempted and/or full-time enrollment in the second term. In Louisiana, there was an increase of 1.2 credits attempted in the second term, and a 15.3 percentage point increase in full-time enrollment. Similarly, in Ohio, program participants showed an increase of 0.6 credits attempted in the second term, and a 6.3 percentage point increase in full-time enrollment. In New Mexico, students in the program attempted almost one full credit more than control group members in the second term. There was no increase in full-time enrollment (12 credits per term) in New Mexico, but the scholarship requires that students enroll in 15 credits in their second term — which is what they consistently need to complete in order to graduate on-time in four years. Looking at the 15-credit benchmark, the program in New Mexico had a 25.6 percentage point impact on second-term enrollment. Lastly, while there was no increase on credits attempted in the second term in New York, the program did have a 7.4 percentage point increase in full-time enrollment.

[11]Richburg-Hayes, Sommo, and Welbeck (2011); Miller et al. (2011); Cha and Patel (2010).
[12]Using a two-tailed t-test applied to differences between research groups, all p-values are less than or equal to 0.10.

Figure 1
Impact on Credits Earned Across All Sites
in MDRC's Evaluations of Performance-Based Scholarship Programs



SOURCE: MDRC calculations from Delgado Community College, Lousiana Technical College, Ohio Board of Regents, University of New Mexico, Borough of Manhattan Community College, and Hostos Community College transcript data.

NOTES: Rounding may cause slight discrepancies in sums and differences.
A two-tailed t-test was applied to differences between research groups. Statistical significance levels are indicated as: *** = 1 percent; ** = 5 percent; * = 10 percent.
Estimates are adjusted by cohort and campus.

- **Varied effects on term-to-term persistence**. While the Louisiana program saw sizeable impacts on rates of registration in virtually every term after random assignment, the early findings in Ohio, New Mexico, and New York have not found similar effects. In part, this is due to high rates of persistence for the control group students in the newer sites, providing a bar that is difficult to improve upon. In addition, while the Louisiana program took place during an economic boom (2004 to 2005), the PBS sites commenced during a period of economic downturn (2008 to 2010). Ohio, New Mexico, and New York also have more generous financial aid options for the average low-income student than did Louisiana at the time of the Opening Doors study, meaning that the control group

students in those states were more likely to have other forms of aid. Additionally, it may be that the target group in Louisiana was particularly well-suited to the intervention. Despite finding no program effects yet on persistence in the PBS Demonstration sites, impacts on academic outcomes continue to exist.

- **Debt reduction.** Both the studies of the Ohio and New Mexico programs found evidence of debt reduction as a result of the performance-based scholarships. Loans made up a smaller proportion of total financial aid for program group students in Ohio and New Mexico than for control group students.

These mostly short-term results suggest that performance-based scholarships can move the dial on some important markers of academic success. If the programs can show lasting effects after the scholarships are no longer available to the students — and impacts on persistence emerge in later terms — these performance-based scholarships could lead to higher graduation rates and translate into higher earnings. MDRC will follow these longer-range outcomes closely in Ohio, New Mexico and New York in the coming terms. In addition, forthcoming results from three more states in the PBS Demonstration — Arizona, California, and Florida — will add to the body of knowledge on the effectiveness of these scholarships on improving academic success for low-income students.

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Education Commission of the States' Testimony

October 3, 2011

Remedial and developmental education is often viewed as an access gateway through which adults underprepared for college-level coursework might receive enrichment in math, reading and writing. Unfortunately, too few students ever successfully complete their remedial sequence, complete a college-level course or earn a credential. According to the Community College Research Center, only 25% of students who are placed into remedial courses earn a postsecondary credential within eight years. In addition, students who are placed three levels below college ready in developmental math have only a 10% chance of ever completing a college-level course. These results are unacceptable, but are more alarming when you consider that students pay tuition and access state and federal financial aid resources to enroll in these courses. Without a fundamental redesign of developmental education at colleges across the nation, the national will not achieve President Obama's goal to have the highest college attainment rate in the world. Furthermore, millions of dollars in federal Pell Grants and subsidized student loans are wasted in a system that is not committed to increasing college completion.

The good news is that we know more about why students fail in developmental education, which instructional strategies have demonstrated measurable and significant results, and how to develop a system-wide strategy for the reform of developmental education. The critical next step is to convince institutional, system and state leaders to implement the policies and practices that will increase the college completion rates of students currently placed into remedial education.

State and federal governments can support innovation and systemic reform by providing financial incentives to institutions that increase student success, fund innovative reforms, collect and report better data on the success of developmental education students, and construct financial aid policies that hold institutions accountable for achieving results with the funds they receive through Pell grants and other federal financial aid programs.

States and institutions can significantly improve student success by creating better and more effective assessment and placement systems, by providing more opportunities for students to accelerate through remediation and by using technology to customize student instruction.

More effective assessment involves better communication to students on the high-stakes nature of placement, use of diagnostics to identify areas of skill mastery and deficit, and advisement on how students can navigate through a remedial course sequence. Effective assessment and placement systems are transparent and thorough and, when implemented, provide students with the information and tools necessary for success.

Once students are placed into developmental education, they should be given every opportunity to accelerate through these courses or avoid them altogether by placing directly into college courses and receive supplemental academic support. A co-requisite model, which has been successfully implemented in English at institution's like the Community College of Baltimore County and in math at Austin Peay University, allows students to enroll in college-level courses and receive additional support through either companion remedial courses or through some other supplemental instruction. In the case of both Austin Peay and the Community College of Baltimore County, student success rates in college-level courses more than doubled for students who were placed directly into college courses rather than first taking a remedial course.

Acceleration most often occurs when institutions adopt a flexible instructional program, where students can complete a course when they have mastered the competencies in the course curriculum, not when the semester is over. Cleveland State University's U Do the Math program, which was featured in speech by President Obama, has significantly increased enrollments in college-level math by creating a technology-based instructional model that allows students to move at an accelerated pace through their remedial courses. The result has been an over 30% increase in college-level math enrollments. If institutions restructured courses so that the majority of students finish developmental education in one semester or less, then remediation might become the gateway it was intended to be.

The use of technology is a powerful tool that encourages innovation in instruction and allows for more customized student learning. For students who score just below the cut off for the initial college-level course, institutions might use technology, tutorials and student supports to co-enroll students in the first college course. Technology can also supplement instruction by providing students with structured assistance in a lab environment. When coupled with modular instruction, students can receive lectures during seat time and test their knowledge through computer-assisted tutorials. The three strategies outlined above improve student success, but the next step is to find ways to sustain these reforms through data collection and performance accountability.

Students placed into remedial courses deplete their financial resources and do not accrue credits toward completion of a degree or certificate. In the case where student financial aid is applied to developmental enrollments, it is a particularly bad investment for state and federal governments, as protracted course sequences actually diminish degree completion odds. States and the federal government could leverage their student financial aid resources to promote student success, not only in developmental education but in terms of completion more broadly. Governments can ensure these investments produce the greatest return by more thoroughly connecting developmental education with college-level curricula and by developing

performance benchmarks that measure student success in an intentional and standardized way.

To be useful, the selection of benchmarks must have evidence in data and policy research. The benchmark most often articulated is success in the first college-level math course, because it is broadly predictive of degree completion. Other benchmarks might measure the number of remedial course completions, time (i.e., in number of semesters) that it takes for a student to complete remediation and persistence through the first year of college courses. The benchmarks are important because they set the stage for collection of student success data, funding based on performance, and development of a culture of evaluation and improvement.

By tying federal support to specific outcomes and by requiring remedial data reporting through the Integrated Postsecondary Education Data System (IPEDS), Congress could contribute to the reduction of time in remediation, the sustainability of innovations and the showcase of best practice. While strategies have provided local solutions to a national challenge — developmental education — federal resources could be leveraged to create a national reform effort around and an agenda for this issue that is so important to the economic development of our nation.

Hearing of the Advisory Committee on Student Financial Assistance
September 30, 2011

Written Testimony on Nontraditional Students
Submitted by David L. Warren, President
National Association of Independent Colleges and Universities
Washington, D.C.

Thank you for soliciting written testimony to supplement the hearing proceedings that are focused on strategies, policies and practices for improving college degree and certificate completion among nontraditional students. The National Association of Independent Colleges and Universities (NAICU) represents close to 1,000 of America's private nonprofit postsecondary institutions, characterized by campuses both large and small, from the Ivy League, women's colleges, historically black and Hispanic-serving institutions, as well as the broad spectrum of faith-based colleges, all of whom dedicate themselves to serving a student population as diverse as the nation itself.

Recent postsecondary education projections released by the U.S. Department of Education's National Center for Education Statistics (NCES) reveal that postsecondary enrollments will continue to grow, reaching 23 million by 2020 (an increase of 13% from 2009) [i]. According to the National Center for Higher Education Management Systems (NCHEMS), this will be insufficient to support the 4.5% annual degree attainment rate increase necessary to achieve President Obama's ambitious, yet worthy, 2020 goal of making the U.S. first in the world in college completion. Unless we significantly increase the proportion of students that complete their degrees, the nation will not reach the 2020 goal. Nontraditional students – broadly defined as any postsecondary student who is not between the ages of 18 and 24 attending full-time – have quietly come to dominate the higher education college-going

landscape. This fact makes them a key demographic in higher education, as well as critical to meeting the nation's goals. NCES predicts that between 2009 and 2020, enrollment of nontraditional students aged 25 to 34 will increase by 21%, and enrollment of adults 35 and above will increase by 16%. Further, students attending part-time will increase by 16%, and first-time freshmen by 11%[ii].

Nontraditional students experience multiple barriers to successful and timely degree and credential completion, and most fail in their efforts to overcome them. Many of these students juggle several competing responsibilities, and their main identity is not tied to that of being a college student; it is an aspect of their lives that frequently takes a back seat to other more pressing responsibilities. Many are employed full-time, have dependents, attend part-time and must periodically "stop-out" of college. These factors present substantial roadblocks to completion, and present a challenge for institutions to find ways to help remove these obstacles. In short, serving nontraditional students requires flexibility, support and multiple pathways to help them achieve their education goals. Fortunately, some national longitudinal data exists (NPSAS, BPS, B&B) that identify and follow students with these risk factors, illuminating the issues they face. Private nonprofit colleges and universities across the nation have already utilized this baseline knowledge, together with on-campus data and experience, to craft programs that have proven to be successful in supporting and serving these students.

While enrolling a highly diversified student body, independent colleges and universities see 79% of their undergraduates earn their bachelor's degree within six years[iii]. Further, among four-year postsecondary institutions, independent colleges and universities enroll 26% of all undergraduate students while conferring 31% of all bachelor's degrees[iv]. This level of student success leads the postsecondary community. It has been achieved while educating a greater proportion of students considered most at-risk for non-completion than

in the other four-year institution sector[v]. More than one-fifth of students enrolled at an independent four-year institution have a family income below $25,000 a year, and over one-third are financially independent; approximately one-quarter are employed full-time, and almost one-fifth delayed their postsecondary enrollment after high school. Further, more than one-quarter are older than twenty-five, and about one-quarter attend part-time. Finally, almost one-fifth of these students have dependents, many juggling the responsibility of being a single parent as well[vi].

These factors long ago necessitated finding innovative ways to reach out and support the needs of the nontraditional student. The success of this history of sustained effort, emphasis and commitment to the success of all students is well documented. Data show that 68% of first-generation students who attend four-year private nonprofit institutions succeed in earning a bachelor's degree within six years, compared with only 33% at colleges and universities nationwide[vii]. For students enrolling with up to three risk characteristics, the six-year bachelor degree completion rate at nonprofit institutions is just under 50%, exceeding the success rates of peer institutions by almost five percentage points[viii]. Further, 61% of students with family incomes below $25,000 attain a bachelor's degree within six years at a four-year independent college versus 49% at a public four-year; and almost 60% from the lowest quartile of SAT or ACT test scores earn a bachelor's degree within six years compared to 47% attending a public institution [ix]. Despite these successes, we recognize that we can – and must – strive to do even more.

In an effort to identify and highlight the programs driving our sector's level of student success and achievement, NAICU, in partnership with the Council of Independent Colleges (CIC), launched an initiative entitled Building Blocks to 2020. Our goal is to identify, collect, and publicize proven programs, making them more visible on a national scale. NAICU does so that others can learn from and/or replicate them, leading to higher levels of student

success across the spectrum of higher education institutional types and levels. To date, NAICU has gathered information on hundreds of diverse and successful programs, and has made them publicly available on its website (http://www.naicu.edu/special_initiatives/2020/) in an effort to inform and encourage the postsecondary community in its entirety. The programs themselves demonstrate the many and varied pathways students require, if they are to navigate the complexities in their life circumstances. Further, the personal stories of hard work and achievement that underlie these programs build on the American spirit, and appeal to citizens across political ideologies. We believe that these programs can serve to inform policy makers and other key stakeholders about meaningful, proven programs that are currently underway. They are demonstrating positive gains in advancing both students and the nation toward their respective completion goals.

Following are just a few examples of the progressive and varied programs that have been quietly transforming the lives of nontraditional students, and are among the hundreds that are publicly available on NAICU's Building Blocks to 2020 website.

1. The Degree Start and Degree Completion programs at Albright College (PA) are accelerated degree programs for working adults and provide a convenient route to earning or completing a degree. Degree Start allows students to earn the general studies portion of their bachelor's degree in as little as two years, while working full time. After two years, students can transfer to Albright's Accelerated Degree Completion Program (DCP) or a traditional Albright daytime degree program.

2. Mary Baldwin College's (VA) Adult Degree Program serves adult students returning to college. The program provides individualized academic counseling, and flexible course options that facilitate access and completion. Students may attend courses

online, in the classroom, in hybrid formats, or in tutorials. Faculty and advisers serve students out of nine regional centers throughout Virginia.

3. The Return to Learn program at Rider University (NJ) provides assistance to adult learners who have completed more than 60 credits but have not earned a degree. Funded by a grant from the New Jersey Commission on Higher Education, the program provides prior fee forgiveness, individualized counseling, and online course and degree options to qualified adult learners.

4. The Resumed Undergraduate Education (RUE) program at Brown University (RI) targets students that are over the age of 25 and have begun college elsewhere, left before earning a degree, and are now returning after more than a five-year absence in academic study. This program offers the option to study part-time, and also offers social events throughout the year. Each RUE student is assigned an academic advisor who assists in planning a course of study that will lead to degree completion.

5. The Women with Children Program at Wilson College (PA) is a residential program offered for single women with children that are 20 months and older. Prospective students and their families undergo a separate interview process to make sure that the family is ready for residential life. Students are able to benefit from all of the programs offered on campus and to participate in co-curricular activities. Child care for children of the appropriate ages is provided without charge to the student.

NAICU and private nonprofit institutions nationwide have been, are, and will remain committed to the success of all students, and will continue to strive for higher rates of meaningful degree and credential completion. NAICU is likewise committed to identifying and disseminating information on the innovative and successful programs of its institutions,

and advocating for their expansion and duplication across the higher education community. We support and remain highly engaged in this important national effort, embracing our responsibilities to our students, the postsecondary community, and the nation.

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[i] U.S. Department of Education, National Center for Education Statistics, Projections of Education Statistics to 2020, Thirty-ninth edition.

[ii] U.S. Department of Education, National Center for Education Statistics, Projections of Education Statistics to 2020, Thirty-ninth edition.

[iii] U.S. Department of Education, National Center for Education Statistics, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-up (BPS:04/09). Data represents Bachelor's degree attainment within six years at any four-year independent institution for full-time students. Analysis by the National Association of Independent Colleges and Universities.

[iv] The Condition of Education 2011 (NCES 2011-033), U.S. Department of Education, National Center for Education Statistics, Section 1, Indicator 8 and Section 5, Indicator 42.

[v] U.S. Department of Education, National Center for Education Statistics, NPSAS: 2008. Most at-risk is defined as possessing four or more risk factors. Data reflects students attending four-year institutions. Analysis by the National Association of Independent Colleges and Universities.

[vi] U.S. Department of Education, National Center for Education Statistics, NPSAS: 2008. Analysis by the National Association of Independent Colleges and Universities.

[vii] U.S. Department of Education, National Center for Education Statistics, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-up (BPS:04/09). Data represents Bachelor’s degree attainment anywhere through 2009 for full-time, first-generation undergraduates enrolled at four-year institutions. Analysis by the National Association of Independent Colleges and Universities.

[viii] U.S. Department of Education, National Center for Education Statistics, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-up (BPS:04/09). Data represents Bachelor's degree attainment within six years at any four-year independent institution. Analysis by the National Association of Independent Colleges and Universities.

[ix] U.S. Department of Education, National Center for Education Statistics, 2003-04 Beginning Postsecondary Students Longitudinal Study, Second Follow-up (BPS:04/09). Data represents Bachelor's degree attainment within six years at first four-year independent institution attended. Analysis by the National Association of Independent Colleges and Universities.